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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOV 23 1988

In Reply Refer To: 3HW12

Mr. Mark D. Coassolo
Associate - Purchasing Administration
Bell Telephone Company of Pennsylvania
1515 Market Street
Philadelphia, PA 19102

Re: Novak Sanitary Landfill Site
Lehigh County, Pennsylvania

Dear Mr. Coassolo:

This letter is written as a response to your company's letter of January 15, 1988 (copy enclosed) and requests additional information concerning your company's involvement with Novak Sanitary Landfill, Inc.; Valley Disposal and Recycling, Inc.; "Valley Disposal"; "Valley Recycling"; LCN Corp.; Novak Landfill and Recycling, Inc.; Novak Landfill Corp. or Novak Sanitation Services, Inc. EPA records indicate that your company used the services of one or more of the above-mentioned companies to transport or dispose of wastes generated by your company. EPA now requests that you respond within thirty (30) days of your receipt of this letter to the questions listed on page two.

As you know, the EPA is seeking information concerning the release, or the threat of a release, of hazardous substances into the environment from the Novak Sanitary Landfill Site. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), public law 99-499, 100 Stat. 1613, your company is again requested to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its officers, employees or agents which concern, refer or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14) which were transported to, or stored, or disposed of at the Novak Sanitary Landfill Site in South Whitehall Township, Lehigh County, Pennsylvania.

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EPA currently has information indicating that the owner of the Novak Sanitary Landfill also operated a waste hauling business under the names listed in the first paragraph of this letter. Records maintained at the landfill office indicate that wastes hauled by these companies were disposed at the Novak Sanitary Landfill. Your company's name is listed as a customer of Valley Disposal.

EPA has determined that your response to its previous information request letter was inadequate or incomplete. EPA now requests that you further respond to this information request within thirty (30) days of your receipt of this letter and supply all information and documentation concerning:

1. the nature of operations at Bell of Pennsylvania's A.B.E. Work Center and the time period of such operation;
2. the types of wastes generated by the A.B.E. Work Center;
3. the types of wastes removed by Valley Disposal or any company listed in the first paragraph of this letter from the A.B.E. Work Center;
4. the volume of wastes identified in response to question number 3;
5. the identification of any potentially hazardous substances in the wastes identified in response to question number 3; and,
6. copies of "further documentation regarding the Company's contractual relationship with Valley Disposal, Inc.".

EPA also requests that if responses to the above questions can not be documented your company identify and interview knowledgeable company representatives who can provide complete information. The company representative should be identified in your response and their information must be submitted to EPA as an affidavit.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

Please send the required information to:

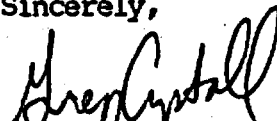
Michael Towle, Remedial Enforcement Officer
U.S. Environmental Protection Agency
PA. CERCLA Remedial Enforcement Section (3HW12)
841 Chestnut Street, 6th Floor
Philadelphia, Pennsylvania 19107

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If you have any questions concerning this matter, please contact Michael Towle at (215) 597-3166; any legal questions should be directed to Joseph Donovan, esq. at (215) 597-0427.

Sincerely,



Gregg Crystall, Chief
PA CERCLA Remedial Enforcement
Section

Enclosures

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